

APR 28 2021

CLERK U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

MARIA ANTONIA LOVOS,

Defendant.

Criminal No. 1:21-CR-102

Count 1: Conspiracy to Make False
Statements in Connection with Firearms
Transactions (18 U.S.C. § 371)

Counts 2-19: False Statements to a
Federal Firearms Licensee (18 U.S.C. §
924(a)(1)(A))

Forfeiture: 18 U.S.C. § 924(d)(1) and 28
U.S.C. § 2461(c)

INDICTMENT

April 2021 Term – at Alexandria

Count One

(Conspiracy to Make False Statements in Connection with Firearms Transactions)

THE GRAND JURY CHARGES THAT:

From on or about October 18, 2019, and continuing through on or about November 15, 2019, within the Eastern District of Virginia and elsewhere, MARIA ANTONIA LOVOS, the defendant herein, did knowingly and unlawfully combine, conspire, agree, and confederate with Jesus Funez Fuentes (“Fuentes”), and with others known and unknown to the grand jury, to commit an offense against the United States of America: namely, to knowingly make false statements and representations with respect to the information required to be kept in the records of a licensed gun dealer in connection with the sale of firearms, in violation of Title 18, United States Code, Section 924(a)(1)(A).

Object of the Conspiracy

The object of the conspiracy was to make money from the sale of illegally purchased firearms.

Ways, Manner, and Means of Accomplishing the Conspiracy

The ways, manner, and means by which members of the conspiracy carried out the object of the conspiracy included the following:

1. It was part of the conspiracy that members of the conspiracy would travel to federal firearms licensees ("FFLs") located within the Eastern District of Virginia to acquire firearms.
2. It was further part of the conspiracy that the Defendant would falsely represent to FFLs that she was purchasing the firearms for herself when she was actually purchasing them on behalf of co-conspirator Fuentes, who, at all times relevant hereto, was a convicted felon and wanted for arrest by law enforcement.
3. It was further part of the conspiracy that co-conspirator Fuentes would sell firearms purchased by the Defendant to individuals for a profit.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, members of the conspiracy committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

1. On or about October 18, 2019, the Defendant purchased a Taurus, model PT111 G2A pistol from Bass Pro Shops, an FFL in Hanover County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

2. On or about October 19, 2019, the Defendant purchased two Taurus, model PT111 G2A pistols from Cabela's, an FFL located in Henrico County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearms, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearms, but was acquiring the firearms on behalf of Fuentes.

3. On or about October 21, 2019, the Defendant purchased a Taurus, model G2C pistol from SSG Tactical, an FFL located in Fredericksburg, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

4. On or about October 21, 2019, the Defendant purchased a Smith & Wesson, model M&P Shield 40 M2.0 pistol from Cabela's, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

5. On or about October 22, 2019, the Defendant, accompanied by Fuentes, purchased a Smith & Wesson, model SD40VE pistol from Dance's Sporting Goods, an FFL located in Colonial Heights, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

6. On or about October 23, 2019, the Defendant purchased a Glock, model 22 pistol from All Shooters Tactical, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm,

when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

7. On or about October 24, 2019, the Defendant, accompanied by Fuentes, purchased a Smith & Wesson, model SD40VE pistol from Dance's Sporting Goods, an FFL located in Colonial Heights, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

8. On or about October 28, 2019, the Defendant purchased a Taurus, model G2C pistol from Dance's Sporting Goods, an FFL located in Colonial Heights, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

9. On or about October 28, 2019, the Defendant, accompanied by Fuentes, purchased a Springfield, model XD pistol from Green Top Sporting Goods, an FFL located in Hanover County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

10. On or about October 29, 2019, the Defendant purchased a Ruger, model EC9s pistol from All Shooters Tactical, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

11. On or about October 29, 2019, the Defendant purchased a Ruger, model EC9s pistol from Trojan Arms Tactical, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

12. On or about October 30, 2019, the Defendant, accompanied by Fuentes, purchased a Kel-Tec, model P-11 pistol from Spec Dive Tactical, an FFL located in Alexandria, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

13. On or about October 30, 2019, the Defendant purchased a Smith & Wesson, model SD9VE pistol from Proven Arms and Outfitters, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

14. On or about October 31, 2019, the Defendant purchased a Ruger, model EC9s pistol from Cabela's, an FFL located in Henrico County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

15. On or about October 31, 2019, the Defendant, accompanied by Fuentes, purchased a Springfield, model XD pistol from Dance's Sporting Goods, an FFL located in Colonial Heights, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the

actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

16. On or about November 2, 2019, the Defendant purchased two Ruger, model EC9s pistols from High Velocity Arms, an FFL located in Spotsylvania County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearms, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearms, but was acquiring the firearms on behalf of Fuentes.

17. On or about November 5, 2019, the Defendant purchased a Springfield, model XD pistol from All Shooters Tactical, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

18. On or about November 6, 2019, the Defendant purchased a Smith & Wesson, model SD9VE pistol from Proven Arms and Outfitters, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

19. On or about November 7, 2019, the Defendant purchased a Springfield, model XD pistol from Dance's Sporting Goods, an FFL located in Colonial Heights, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

20. On or about November 8, 2019, the Defendant, accompanied by Fuentes, purchased a Taurus, model TH40C pistol from Dance's Sporting Goods, an FFL located in Colonial Heights, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

21. On or about November 8, 2019, the Defendant purchased two Ruger, model EC9s pistols from Bass Pro Shops, an FFL located in Hanover County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearms, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearms, but was acquiring the firearms on behalf of Fuentes.

22. On or about November 10, 2019, the Defendant purchased a Springfield, model XDS pistol and a Springfield, model XD pistol from Cabela's, an FFL located in Prince William County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearms, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearms, but was acquiring the firearms on behalf of Fuentes.

23. On or about November 14, 2019, the Defendant, accompanied by Fuentes, purchased a Springfield, model XD pistol from Spec Dive Tactical, an FFL located in Alexandria, Virginia, within the Eastern District of Virginia. The Defendant falsely stated that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

24. On or about November 15, 2019, the Defendant, accompanied by Fuentes, purchased a Smith & Wesson, model M&P 40 pistol from Clark's Gun Shop, an FFL located in Fauquier County, Virginia, within the Eastern District of Virginia. The Defendant falsely stated

that she was the actual transferee of the firearm, when the defendant knew, in truth and in fact, that she was not the actual transferee of the firearm, but was acquiring the firearm on behalf of Fuentes.

(All in violation of Title 18, United States Code, Section 371.)

Count 2

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 18, 2019, in Hanover County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Taurus, model PT111 G2A, 9mm caliber pistol, from Bass Pro Shops, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Bass Pro Shops' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 3

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 19, 2019, in Henrico County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of two Taurus, model PT111 G2A, 9mm caliber pistols, from Cabela's, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Cabela's records, in that with respect to each firearm, the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of each of the listed firearms, but was acquiring each firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 4

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2019, in Prince William County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Smith & Wesson, model M&P Shield 40 M2.0, .40 caliber pistol, from Cabela's, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Cabela's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 5

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 22, 2019, in Colonial Heights, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Smith & Wesson, model SD40VE, .40 caliber pistol, from Dance's Sporting Goods, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Dance's Sporting Goods' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 6

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2019, in Prince William County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Glock, model 22, .40 caliber pistol, from All Shooters Tactical, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in All Shooters Tactical's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 7

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2019, in Colonial Heights, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Smith & Wesson, model SD40VE, .40 caliber pistol, from Dance's Sporting Goods, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Dance's Sporting Goods' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 8

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2019, in Hanover County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Springfield, model XD, 9mm caliber pistol, from Green Top Sporting Goods, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Green Top Sporting Goods' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 9

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2019, in Prince William County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Ruger, model EC9s, 9mm caliber pistol, from Trojan Arms Tactical, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Trojan Arms Tactical's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 10

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 30, 2019, in Alexandria, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Kel-Tec, model P-11, 9mm caliber pistol, from Spec Dive Tactical, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Spec Dive Tactical's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 11

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 31, 2019, in Colonial Heights, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Springfield, model XD, .40 caliber pistol, from Dance's Sporting Goods, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Dance's Sporting Goods' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 12

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 2, 2019, in Spotsylvania County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition two Ruger, model EC9s, 9mm caliber pistols, from High Velocity Arms, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in High Velocity Arms' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearms listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of each of the listed firearms, but was acquiring each firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 13

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2019, in Prince William County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Springfield, model XD, .357 caliber pistol, from All Shooters Tactical, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in All Shooters Tactical's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 14

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 6, 2019, in Prince William County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Smith & Wesson, model SD9VE, 9mm caliber pistol, from Proven Arms and Outfitters, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Proven Arms and Outfitters' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 15

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 7, 2019, in Colonial Heights, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Springfield, model XD, .40 caliber pistol, from Dance's Sporting Goods, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Dance's Sporting Goods' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 16

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2019, in Colonial Heights, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Taurus, model TH40C, .40 caliber pistol, from Dance's Sporting Goods, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Dance's Sporting Goods' records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 17

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2019, in Prince William County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a Springfield, model XDS, .45 caliber pistol, and a Springfield, model XD .45 caliber pistol, from Cabela's, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Cabela's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 18

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 14, 2019, in Alexandria, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Springfield, model XD, .45 caliber pistol, from Spec Dive Tactical, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Spec Dive Tactical's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

Count 19

(False Statement to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 15, 2019, in Fauquier County, Virginia, within the Eastern District of Virginia, the defendant, MARIA ANTONIA LOVOS, in connection with the acquisition of a firearm, that is, a Smith & Wesson, model M&P 40, .40 caliber pistol, from Clark's Gun Shop, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in Clark's Gun Shop's records, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that the defendant was the actual buyer of the firearm listed on the form, when the defendant knew, in truth and in fact, that she was not the actual buyer of the listed firearm, but was acquiring the firearm on behalf of another person.

(In violation of Title 18, United States Code, Section 924(a)(1)(A).)

FORFEITURE NOTICE

THE GRAND JURY FINDS PROBABLE CAUSE FOR FORFEITURE AS
DESCRIBED BELOW:

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, the defendant is hereby notified that, if convicted of any of the offenses alleged in Counts 1 through 19 of this Indictment, she shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition purchased or possessed, in violation of Title 18, United States Code, Section 924(a)(1)(A). This property includes, but is not limited to, the following:

- (a) Taurus, model PT111 G2A pistol (bearing serial no. TMR31376);
- (b) Taurus, model PT111 G2A pistol (bearing serial no. TMR14285);
- (c) Taurus, model PT111 G2A pistol (bearing serial no. TMR12814);
- (d) Taurus, model G2C pistol (bearing serial no. TMT29245);
- (e) Smith & Wesson, model M&P Shield 40 pistol (bearing serial no. LFE9685);
- (f) Smith & Wesson, model SD40VE pistol (bearing serial no. FBN9781);
- (g) Glock, model 22 pistol (bearing serial no. CMK156US);
- (h) Smith & Wesson, model SD40VE pistol (bearing serial no. FXV3611);
- (i) Taurus, model G2C pistol (bearing serial no. TMT51701);
- (j) Springfield, model XD pistol (bearing serial no. ATI31977);
- (k) Ruger, model EC9s pistol (bearing serial no. 456-20963);
- (l) Ruger, model EC9s pistol (bearing serial no. 456-07217);
- (m) Kel-Tec, model P-11 pistol (bearing serial no. AVG06);
- (n) Smith & Wesson, model SD9VE pistol (bearing serial no. FBB8793);

- (o) Ruger, model EC9s pistol (bearing serial no. 456-63003);
- (p) Springfield, model XD pistol (bearing serial no. GM127263);
- (q) Ruger, model EC9s pistol (bearing serial no. 456-46132);
- (r) Ruger, model EC9s pistol (bearing serial no. 456-41947);
- (s) Springfield, model XD pistol (bearing serial no. US327236);
- (t) Smith & Wesson, model SD9VE pistol (bearing serial no. FBW1396);
- (u) Springfield, model XD pistol (bearing serial no. US191559);
- (v) Taurus, model TH40C pistol (bearing serial no. SMD64194);
- (w) Ruger, model EC9s pistol (bearing serial no. 456-25473);
- (x) Ruger, model EC9s pistol (bearing serial no. 456-36569);
- (y) Springfield, model XDS pistol (bearing serial no. HG102913);
- (z) Springfield, model XD pistol (bearing serial no. GM492536);
- (aa) Springfield, model XD pistol (bearing serial no. US712264); and
- (bb) Smith & Wesson, model M&P 40 pistol (bearing serial no. MPM4241).

(Pursuant to 18 U.S.C. § 924(d)(1); 28 U.S.C. § 2461(c); and Rule 32.2(a) of the Federal Rules of Criminal Procedure)

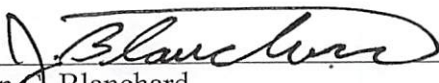
A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON

Raj Parekh
Acting United States Attorney

By:



John C. Blanchard
Assistant United States Attorney